



R & SONS CONSTRUCTION LTD

PLANT HIRE & CIVIL ENGINEERING CONTRACTORS

ENVIRONMENT MANAGEMENT PLAN



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DEFINITIONS

Terms which are used throughout this document are defined according to OZ Document 1.7.2LS001 Glossary & Definitions

CDL	Container Deposit Legislation
EMP	Environmental Management Plan
EMS	Environmental Management System
EPA	Environment Protection Authority
MARP	Mining and Rehabilitation Program
MGB	Mobile Garbage Bin
NGERS	National Greenhouse Gas and Energy Reporting Scheme
SOP	Standard Operating Procedure

INTRODUCTION

The purpose of this Environment Management Plan (EMP) is to provide a consolidated guidance for the management of hazardous and non-hazardous waste. This plan covers the generation, segregation, collection, storage, transportation and disposal or recycling of hazardous waste and non-hazardous waste, including waste water, within the mining lease, construction lease and associated infrastructure. The aim is complying with relevant legislation and lease conditions and to minimise and manage adverse effects from construction or mine related activities on the Environment and Human Health.

BACKGROUND

Waste disposal practices have historically and fundamentally relied on landfill as the predominant technology, but this approach is now changing to a focus on improved resource recovery and reduced disposal to landfill. Benefits arising from a reduction of waste disposed to landfill include not only reduced greenhouse gas emissions, but also improved water quality, reduction of land degradation, reduced demand for natural resources, and better amenity in some areas. Reduction in waste to landfill also equates to greater cost savings through the recovery of materials from the residual waste stream. Industrial organizations are now recognizing a social and environmental responsibility to ensure that efficient waste management practices are established across all aspects of their operations

SCOPE

This Plan covers all R & Sons Construction Ltd. Projects, but with the separation of individual waste streams balanced by a practical ability to provide the required range of infrastructure beyond the immediate work area and local village areas. The purpose of the Plan is to detail how impacts on biodiversity or human health, legal and other obligations of the project work and other relevant bodies will be managed by R & Sons. It identifies and defines actions to manage any impacts by prescribing safe operating procedures (SOPs) to be followed through the construction, operation and closure phases of the Projects.

CONTEXT

Legislation

The Environmental Protection Authority (PNG EPA) regulates the waste and resource recovery industry in Papua New Guinea through the provisions of the *Environment Protection Act*. Other legislation relevant to the Plan includes:

- *Environment Act 2000 (PNG)*;
- *ISO 14001 Environment Management Systems*.

Accountabilities and Authorities

The Plan forms a part of the R & Sons Construction Environmental Management System (EMS), developed to meet the requirements of legislation, industry best practice, good corporate social responsibility principles and requirements made as part of PNG Government approval processes. The procedures to be followed during the construction and operation of the project in this Plan are described below.

The **Managing Director** is responsible for the overall company commitment to the management of Waste and to ensure all project activities are undertaken in full compliance with statutory regulations and are consistent with OZ Minerals environmental policy, systems and management measures. The **Project Manager** is responsible for ensuring their department complies with all

procedures under the management plan and that their respective units of operation do not breach any of the licence or state and regulatory requirements. The **Health, Safety, Security, Environment & Training Manager** is responsible for ensuring procedures and policies are in place and reviewed to adequately allow for relevant training and education in the requirements of waste and recyclables management and resource recovery, and to audit the procedures in place, and to ensure the allocation of appropriate resources and trained personnel to meet the requirements of this management plan. The **Departmental Supervisors** are responsible for the implementation of the Plan within the areas of their control to minimise waste to landfill. The **Waste Services Contractor** is responsible for operation of the landfill in accordance with EPA guidelines, recording of waste volumes and implementation of the Plan through the waste services contract. All **Supervisors, Workers and Contractors** are responsible for actively participating in procedures and always must adhere to the site requirements as stated in this Plan.

Key Stakeholders

Stakeholder consultation identified concerns over negative environmental impacts including pollution arising from construction and operations, along with protection of the environment and the health and safety of workers and contractors has raised the need for a consolidated waste management plan. The key stakeholders are those with an interest in making R & Sons Projects a success in terms of environmental management. The key stakeholders include:

- Native Land Title Owners
- Community Leaders
- Government Representatives
- Environment Protection Authority

OBJECTIVES

Company Objective

The outcomes for waste management require minimization of the overall environmental impacts through the management and disposal of waste. Due to the isolated location of some project sites there are no specific Lease conditions that pertain to the management of waste and no outcome measurement criteria have been specified.

Environment Management Plan Objectives

The objectives of the Plan as defined by R & Sons relating to the management of hazardous wastes, nonhazardous wastes and wastewater, legislative requirements and best practice waste management procedures, can be expressed as:

- to manage waste in accordance with the principles of the Waste Hierarchy;
- to manage the generation, segregation, collection, storage, transportation and disposal or recycling of hazardous wastes and, non-hazardous wastes to minimize the risk of an incident causing environmental nuisance or material environmental harm, such as fire or through the contamination of land or water resources, or through the provision of food sources for people and animals;
- to facilitate a sustained effort to increase the type, quality and amount of resources recovered from the waste stream, and maximize and preserve the resource integrity and value of recoverable and reusable materials;
- to minimize the quantity of waste disposed to landfill, and limit landfill closure and reclamation costs;
- to provide high standard, integrated waste and resource recovery services, based on 'best practice' principles which are complementary to national and state waste management policies;

- to ensure compliance with relevant license and legislative requirements.

R & Sons has adopted the *Waste Hierarchy* as a fundamental principle and reference for this Waste Management Plan. The *Waste Hierarchy* is an internationally accepted philosophy for setting the priorities and guiding efforts to manage waste. It establishes approaches to waste management according to their importance and preference in descending order. Waste avoidance and reduction are regarded as the most preferable approach, and to the extent that this cannot be achieved, reuse, recycling and recovery of waste are the next preferred, with treatment and disposal the least preferred.



ENGINEERING AND MANAGEMENT CONTROL STRATEGIES

The infrastructure, management and control strategies below establish the minimum requirements to establish effective and holistic management of waste and resource recovery by R & Sons projects and sites.

Waste Classifications

Non-Hazardous Waste

A list of expected non-hazardous waste streams shall exist as an appendix to this plan.

Hazardous Waste

A waste is considered hazardous if it is ignitable, corrosive, reactive, toxic or radioactive or otherwise classified as hazardous by the Dangerous Goods Act (2003) or relevant legislation, including but not limited to waste oils, hydrocarbons, used tyres. Any waste listed under the Environment Act 2000. A list of hazardous waste streams generated by site practices shall exist as an appendix to this plan.

Waste Water

Any water that is required to be disposed of, or re-used for a different purpose, is classified as waste water. Waste water includes any water that is potentially contaminated, excess pit water and all excess water remaining after it has been used for its original purpose. A list of sources for waste water shall exist as an appendix to this plan.

Hazardous and non-Hazardous Waste Separation

Hazardous and non-hazardous waste shall not be mixed and must be segregated at the source. The Waste Services Contractor shall develop a collection schedule that details how hazardous and nonhazardous waste will be separated and processed (disposed or recycled) in accordance with this.

Waste Infrastructure

Landfill

The Waste Services Contractor shall construct and operate the landfill in accordance with this plan. A Landfill Environmental Management Plan (LEMP) is to be prepared by the waste contractor. The LEMP shall provide the basis for management and mitigation of environmental impacts during construction, operation and closure of the landfill, as well as the post-closure period.

Resource Recovery Centre

The Resource Recovery Centre is a purpose-built work area designed to house a baling press, sorting tables, bin handling equipment, serve as a work area to meet general resource recovery activities and store recyclable material prior to transport. It is the base for the site Waste Services Contractor.

Recycling Yard

The recycling yard is established as an additional designated resource recovery storage and processing area under the management and operation of the Waste Services Contractor. The purpose of this yard is to provide a central location for contractors to dispose of recyclable material; primarily steel, cardboard, timber and batteries.

Bioremediation Pad

The bioremediation area is a contained area purpose built for the bioremediation of contaminated soil and storage of waste hydrocarbons and other hazardous/listed wastes that require containment.

Collection

The Waste Services Contractor shall develop a collection schedule that details how each Hazardous and Non-Hazardous waste stream will be separated and processed (disposed or recycled) in accordance with this Plan and the frequency for collection. General guidance for collection of waste is contained within the appendices of this Plan.

Non-Hazardous Waste

Non-Hazardous waste streams will be collected by either the Waste Services Contractor or Site Services Contractor as determined by their respective contractual agreements and transferred to the appropriate disposal or processing location. Non-Hazardous waste shall be collected as frequently as required to achieve the outcomes of this plan and satisfy the needs of the waste producer. Collection infrastructure such as bins shall be individually labelled and identified by a colour coded as below, or where this is not possible clearly labelled to show the waste being collected.

- Recyclables – YELLOW;
- Paper & Cardboard – BLUE;
- Non-Hazardous Non-Recyclable (Residual) – RED.

Hazardous Waste

The procurement of all hazardous materials and dangerous goods shall be undertaken in accordance with the Hazardous Substances Management Plan. Hazardous waste shall be collected at the source to ensure compliance to this Plan and shall only be handled by competent personnel conversant in the relevant hazardous materials/waste procedures.

Storage

Non-Hazardous Waste

Non-Hazardous waste is to be stored prior to recycling, transport or disposal such that:

- It is clearly segregated if it is to be recycled;

- Wind-blown litter is avoided;
- The quality of recoverable material is not reduced due to contamination or the elements.

Hazardous Waste

Storage of hazardous wastes shall be in accordance with the requirements of the Hazardous Substances Management Plan and relevant legislation. Listed wastes shall be stored in accordance with the relevant EPA guidelines and/or the Hazardous Substances Management Plan.

Transportation

Non-Hazardous Waste

Non-Hazardous waste is to be transported in accordance with the Traffic Management Plan, loose material is to be covered and the appropriate clearances and appropriate checks are to be completed before waste leaves site (radiation, vegetation, asset disposal etc.).

Hazardous Waste

Transport of hazardous wastes shall be in accordance with the requirements of the Hazardous Substances Management Plan and relevant legislation. Listed wastes (including hydrocarbons) shall be transported in accordance with the relevant EPA guidelines and/or the Hazardous Material Management Plan.

Disposal

The Waste Services Contractor shall develop a collection schedule that details how each Hazardous and Non-Hazardous waste stream will be disposed or recycled in accordance with this Plan for approval by R & Sons. General guidance for the disposal of individual waste streams is contained within the appendices of this Plan.

Non-Hazardous Waste Disposal

Individual waste streams shall be assessed using the waste hierarchy to establish a disposal method. All non-recoverable non-hazardous waste shall go to the site landfill; all practicably recoverable material shall be recycled.

Non-Hazardous Waste Recycling

Recoverable non-hazardous wastes shall be transported offsite to appropriate recycling facilities or reused onsite where appropriate.

Hazardous and Listed Waste Disposal

The HSSE & Training Manager or delegate shall be notified prior to any disposal of hazardous substances. A Hazardous waste disposal procedure shall exist to ensure that hazardous and listed wastes are disposed of in accordance with company policy, legislation and best practice; the disposal method for each hazardous and listed waste stream shall be decided using this procedure. The choice of disposal method shall be recorded and written documentation for each disposal method shall exist. Hazardous and listed wastes shall not be disposed of in the site landfill unless approved in writing from regulatory agencies and the repository has been designed to be protective of human health and the environment. Hydrocarbon contaminated soils from small onsite hydrocarbon spills and soil/sediment from the wash bay facility shall be placed in the bioremediation facility.

Waste Water Disposal

Waste water should be disposed of or treated in accordance with the Waste Water procedure to ensure that waste water is disposed of, or re-used, in accordance with company policy, legislation and best practice. The procedure defines categories of waste water by quality, accepted methods of disposal and re-use and an internal approval process for disposing of waste water.

Administration

Management and training of workers and contractors may be used to control risks associated with waste management and resource recovery. All workers and contractors should be made aware of any waste management related risks through the site induction, and the Environment Department are responsible for the training and management of worker exposure to waste management risks.

MONITORING STRATEGIES

All Waste

Routine waste facility inspections are required to verify that wastes are managed in accordance with this Plan and any other relevant plans. Environmental audits of waste infrastructure described in 4.3 shall occur quarterly. The lists of all waste streams generated by site i.e. the appendices to this Plan, shall be updated annually or in the event of any significant change to site practices.

Hazardous Waste

Prior to the procurement of any new hazardous materials a risk assessment shall classify the material within ChemWatch as per the Hazardous Substances Management Plan and shall consider and document the disposal method for generated wastes in accordance with this Plan.

SUPPORTING DOCUMENTATION

This Management Plan outlines the general management and monitoring programmes but is not intended to provide methodologies or working practices. The following section details related management plans, supporting documents including Standard Operating Procedures (SOPs), maps, plans and other relevant information. Each of these documents must be adhered to when their specific activities are being undertaken.

CONTROLS

Training

Managers, Superintendents and Senior Employees must be familiar with the management plan and ensure all workers and contractors undertaking related tasks are familiar with the requirements of this plan and trained. If additional training and instruction is required to ensure the activities are undertaken effectively, training and assessment should be carried out by HSSE & Training Department and competency signed off by a senior member of that Department.

Records

HBS shall maintain a data management system to:

- ensure consistent, timely and accurate data entry;
- store data in a manner that enables the data to be easily identified, located and retrieved;
- back up data on a routine basis to protect against loss;
- assign responsibility for maintenance of the data management system;
- data analysis, trending and interpretation.

Hard copy and electronic monitoring and measurement data shall be retained as records.

All training records produced from the implementation and application of this Plan shall be retained for a period of at least 5 years. All risk assessment documents shall be retained for a minimum of 5 years. All monitoring records shall be retained for a minimum of 30 years from the last recorded date. Data trends, interpretation and recommendations are to be provided to the site management team during Management Reviews as the basis for decision making. If approved by site

management, any relevant data analysis, interpretation and recommendations are to be provided to external stakeholders in an appropriate manner when required.

Audit

An annual internal audit or assessment of this plan and R & Son's compliance to the Environmental Management Plan shall be performed annually. This process will enable R & Sons to review the effectiveness of the Plan to provide adequate management of waste and resource recovery and ensure that all workers and contractors are operating within the requirements of the Plan. External audits shall occur at minimum every three years. Review, assessments and audits shall be conducted by competent professionals.

Reporting

Each month waste figures must be reported by the Waste Services Contractor to the HSSE & Training Department for addition to the sustainability report. Quarterly reporting must also be completed based on tonnages of material recycled to track improvements towards the site lead indicator.

Review

This Plan shall be reviewed:

- every 3 years;
- when there is a change in Legislation, Code of Practice, Australian Standard or other relevant reference material; or
- if there is an incident to which this Plan was relevant.

LIST OF EXPECTED NON-HAZARDOUS WASTE STREAMS

The list contained in this appendix has been generated based on operational experience at Prominent Hill; it shall be used as a guide for waste management and updated as required by the Plan.

Non-Hazardous-Non-Recyclable

Expected waste streams that have been defined as non-hazardous and non-recyclable (also known as non-hazardous residual waste) by the Plan are presented in the table below.

Material	Description	Collection Points	Disposal
<i>Non-Hazardous Residual Waste</i>			
General Residual Waste	General waste (refuse and rubbish) and materials not able to be viably recovered or recycled. At the present time this includes all organic food wastes as it is not considered practicable to process this stream on site.	Small Items Red lid 140 litre Residual Waste located throughout the Village, Mess and site. Larger Items: Employees to place in designated collection location at RRC or Recycling Yard.	Residual Waste to be collected by Waste Contractor or Services Contractor and contents disposed to site landfill.
Construction and Demolition	Concrete and similar inert construction and demolition wastes	Generally collected in bulk from site where generated	Waste contractor to coordinate and liaise R & Sons staff to identify potential areas where excess from concrete pour could be

			used, disposal in on-site waste rock dump.
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Non-Hazardous Recyclable

Expected waste streams that have been defined as non-hazardous and recyclable by the Plan are presented in the table below.

Recyclable Domestic Waste - means the following containers, packaging and products emanating from site activities:

- Recyclable Paper and Cardboard as defined below;
- Liquid paperboard cartons;
- Glass bottles and jars (excluding crockery);
- Aluminium rigid and semi-rigid packaging;
- PET (1), HDPE (2) and PVC (3) rigid plastic packaging;
- Other rigid plastic packaging including LDPE (4), PP (5), PS (6);
- Steel rigid packaging, including aerosol cans; and, any other recyclables as nominated by Oz Minerals from time to time.

Recyclable Paper and Cardboard – means the following clean materials are not contaminated by food, oils, dirt etc.:

- Newspapers;
- Magazines;
- Junk mail;
- Stationery;
- Office paper;
- Envelopes;
- Telephone books;
- Egg cartons;
- Cardboard;
- Any other items as nominated by R & Sons Constructions Ltd from time to time.

Recyclable Material	Description	Collection Points	Recycling and Disposal
ALUMINIUM			
Beverage containers subject to Container Deposit Legislation – CDL	Aluminium soft drink or beer cans	Yellow lid 240 litre Recyclables located throughout the Village, Mess and site.	Recyclables to be collected by Waste Contractor or Services Contractor and sorted at Resource Recovery Centre. All products sorted for transport to a licensed recycler.
Packaging	Aluminium rigid and semi-rigid packaging & clean food packaging trays	Yellow lid 240 litre Recyclables located throughout the Village, Mess and site.	Recyclables to be collected by Waste Contractor or Services Contractor and sorted at Resource Recovery Centre. All non-aluminium to be sorted/baled and stored for periodic transport to off-site recycling processor.
GLASS			
Beverage containers subject to Container Deposit Legislation – CDL	Glass soft drink or beer bottles. NOT wine or spirit bottles	Yellow lid 240 litre Recyclables located throughout the Village, Mess and site. OR	Recyclables and CDL to be collected by Waste Contractor or Services Contractor and sorted at Resource Recovery Centre. All CDL products sorted for transport to a Licensed Dealer.
General	Glass products no longer suitable for use. Includes jars, wine and spirit bottles. NOT crockery	Yellow lid 240 litre Recyclables located throughout the Village, Mess and site.	Recyclables MGBs to be collected by Waste Contractor or Services Contractor and sorted at Resource Recovery Centre. All non CDL glass to be sorted and stored for periodic transport to off-site recycling processor.
Laboratory	Glass products used in laboratory tests and no longer suitable for use.	Red lid 140 litre Residual Waste, unless otherwise designated at Laboratory.	Residual Waste collected by Waste Contractor for disposal in the site landfill.
PLASTIC			
Beverage containers subject to Container Deposit Legislation – CDL	Plastic (usually PET 1) soft drink, flavoured milk or water bottles. NOT Pure milk	Yellow lid 240 litre Recyclables located throughout the Village, Mess and site. OR Yellow lid 140 litre Bottles & Cans in the Wet	Recyclables and CDL to be collected by Waste Contractor or Services Contractor and sorted at Resource Recovery Centre. All CDL products sorted for transport to a licensed

General (non CDL material)	High density polyethylene HDPE (2), rigid plastic packaging, PVC(3), LDPE(4), PP(5), PS(6)	Mess area. Yellow lid 240 litre Recyclables located throughout the Village, Mess and site.	recycler. Recyclables to be collected by Waste Contractor or Services Contractor and sorted at Resource Recovery Centre. All non CDL plastic to be sorted and baled for periodic transport to off-site recycling processor.
Piping	Poly pipe not required and not suitable to retain for future use	Employees to place in designated storage location at RRC or Recycling Yard	Waste Contractor to consolidate for periodic transport to off-site recycling processor

LIQUID PAPERBOARD

Beverage containers subject to Container Deposit Legislation – CDL	Liquid paperboard drink cartons, usually fruit juices or flavoured milk	Yellow lid 240 litre Recyclables located throughout the Village, Mess and site. OR Yellow lid 140 litre Bottles & Cans in the Wet Mess area	Recyclables and CDL to be collected by Waste Contractor or Services Contractor and sorted at Resource Recovery Centre. All CDL products sorted for transport to a licensed recycler
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RECYCLABLE COMMERCIAL AND INDUSTRIAL (C&I) OR CONSTRUCTION AND DEMOLITION (C&D) WASTE

RECYCLABLE PAPER AND CARDBOARD

Clean Paper and Cardboard	<ul style="list-style-type: none"> Office paper Newspapers Magazines Cardboard NOT contaminated with food, oils, dirt etc.	Yellow lid 240 litre Recyclables located throughout the Village, Mess and site. OR Blue lid 240 litre Paper/Cardboard Only OR Under desk combo recycle/garbage bin OR Multi-bin	Recyclables and Paper/Cardboard collected by Waste Contractor or Services Contractor and sorted at Resource Recovery Centre. Paper and cardboard sorted, baled and stored for transport to off-site recycling processor.
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METALS

General	Metal items, scrap or off-cuts not suitable for further use on site, including steel rigid packaging and aerosol cans	Small items: Yellow lid 240 litre Recyclables located throughout the Village, Mess and site. Larger Items: Employees to place in designated storage location at RRC or Recycling Yard.	Waste Contractor to consolidate for periodic transport to off-site recycling processor.
Copper Wire	Copper wire not suitable for future use on site.	Employees to place in designated storage location at RRC or Recycling Yard.	Waste Contractor to consolidate for periodic transport to off-site recycling processor.

WOOD

Returnable pallets in good condition	Wooden pallets in good condition, suitable for reuse that can be returned to the supplier.	Employees to place in designated storage location at RRC or Recycling Yard.	Waste Contractor to consolidate for return to supplier.
Non-returnable pallets in good condition	Wooden pallets in good condition, suitable for reuse but cannot be returned to the supplier.	Employees to place in designated storage location at RRC or Recycling Yard	Waste Contractor to assess condition and liaise with Core Yard regarding reuse for core storage
Any other wood products. Not CCA Treated	Wooden pallets, packaging, furniture and any other wood based items not suitable for reuse.	Employees to place in designated storage location at RRC or Recycling Yard	Waste Contractor to assess condition and burn in fire training drills.

CONVEYOR BELT

General	Used cooking oil from accommodation village kitchen	Employees to deposit in the container located at the rear of the kitchen	Waste Contractor to collect and consolidate for periodic transport to off-site recycling processor
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COOKING OIL

General	Used cooking oil from accommodation village kitchen	Employees to deposit in the container located at the rear of the kitchen	Waste Contractor to collect and consolidate for periodic transport to off-site recycling processor.
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RUBBER

Rubber products	Rubber items, scrap or off-cuts not suitable for further use on site, including hoses. NOT tyres	Employees to place in designated storage location at Landfill or Recycling Yard	Waste Contractor to consolidate for periodic transport to off-site recycling processor, or for disposal in site landfill of material unsuitable for recycling.
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LIST OF EXPECTED HAZARDOUS WASTE STREAMS

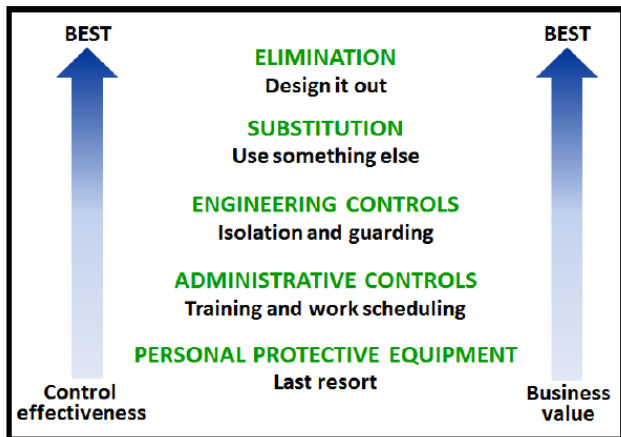
The list contained in this appendix has been generated based on operational experience at R & Sons Construction Ltd project sites and shall be used as a guide for waste management and updated as required by the Plan.

Material	Description	Collection point	Disposal
<i>Hazardous Residual Waste</i>			
Waste Oil/ Hydrocarbons (Listed Waste)	Left over oils and fuels from site processes	Collected in tanks located throughout site	Collected by licensed contractor and disposed of off-site. May be stored on Bioremediation Pad
Oil Rags & Filters (Listed Waste)	Left over oil rags and filters from site processes	Collected from contained areas in Tanks located throughout site. Stored on Bioremediation Pad or other area prior to transport.	Collected by Licensed Waste Contractor and disposed of off-site
Hazardous Chemicals	Waste hazardous chemicals produced/ left over from site processes	Collected in appropriate Storage Facility or capture as outlined in appropriate MSDS	Disposed of at Tailings Storage Facility or as advised by relevant MSDS. On a case by case basis
Potentially Asbestos Contaminated Material (Listed Waste)	Waste PPE which has come in contact with Asbestos.	Collected in spin bin located at Lae lay down area	Collected and buried at site landfill in accordance with legislation
Fluorescent Bulbs	Waste fluorescent bulbs left over from site processes.	Collected at Recycling Yard	Collected and disposed by certified waste contractor off site
Batteries	Waste batteries left over from site processes.	Collected on bundled pallets and battery waste boxes located at various points throughout site	Collected and disposed by certified waste contractor off site.
Tyres (Listed Waste)	Light and heavy vehicle	Employees to place in designated	Waste Contractor to consolidate and sort for periodic

	tyres from vehicles only, and no longer suitable for use	storage location at RRC or Recycling Yard	transport to off-site recycling processor or use onsite as bundling or road markers.
Medical Waste (Listed Waste) Not Sharps	Waste created by the operation of the medical centre that poses a hazard.	Admin Medical Centre and First Aid Room – Collected in labelled biohazard bags	Disposed of at landfill separately according to legislation
Medical Sharps	Medical Sharps (syringes, needles etc.) and any other sharp articles	Collected in approved (AS4031) sharps contained	Containers transported to Lae International Hospital as required.
CCA Timber	Timber treated with Copper Chromate Arsenic	Recycle Yard, various contactors	Disposed of in landfill. DO NOT COMBUST
Sludge from Wash Bay	Sludge generated by site Wash Bay	WWTP Sludge Tank	Transported offsite by licensed Waste contractor
Sewerage from Septic Tanks	Septic Tanks	Contractors portable toilets etc.	Transported offsite by licensed Waste contractor.
Hydrocarbon Contaminated Soil	Spills and sediment from wash down pad	Taken from source (spills or wash bay) to the bioremediation pad	Once material is below approved contamination limits, use as cover material at landfill.

PROJECT RISK ASSESSMENT & MATRIX

Risk Analysis – RISK MATRIX									
Step 1 – Consider Consequences		Step 2 – Consider Likelihood		Step 3 – Calculate Risk					
What are the consequences of the hazard occurring? Consider what is the most probable consequence (below) with respect to this work hazard		What is the likelihood (below) of the hazard consequence in Step 1 occurring.		1. Take Step 1 rating and select correct column 2. Take Step 2 rating and select correct row 3. Use the risk score where the two ratings cross on the matrix below H = High, S = Serious, M = Medium, L = Low					
Extreme Critical Major Minor	Workplace Safety	Legislative & Regulatory	Almost Certain Is expected to occur in most circumstances (once per year) Likely Will probably occur at least once (every 5 years) Possible Event might occur at some time (10yrs) Unlikely/Rare Event not expected to occur/ only in exceptional circumstances (20+yrs)	matrix below					
	Multiple fatalities	Non-compliance, business activity affected/penalty enforced		Consequences					
	Single Fatality or serious injury/illness	Major non-compliance resulting in regulatory notice			Min	Maj	Crit	Ext	
	Medical treatment /LTI	Non-compliance - warning		Likelihood	Almost Certain - (A)	S (A4)	S (A3)	H (A2)	H (A1)
	First Aid and/or medical treatment	Minimal non-compliance			Likely - (B)	M (B4)	S (B3)	H (B2)	H (B1)
		Possible - (C)	L (C4)		M (C3)	S (C2)	S (C1)		
		Unlikely/Rare - (D)	L (D4) (4)		M (D3) (3)	M (D2) (2)	S (D1) (1)		



In the illustration of the hierarchy of hazard control, the most effective means is at the Top, and the least effective at the Bottom

- 1- Elimination
- 2-Substitution
- 3-Isolate
- 4- Engineering
- 5-Administrative
- 6 - PPE

This assessment will be based on the details of the works to be completed and the site limitations as well as culture/controls used previously for high risk/critical control. Listed below are some of the High-Risk Tasks and Recommended Controls;

Operations

- Driving and loads on steep grades
- Loading
- Hauling
- Dumping
- Recovery and towing
- Driving in Active Project site
- Pioneering

Workshop and Maintenance

- Working at heights
- Use of power tools
- Supervision of workforce
- Tyre Changing
- Service truck operations
- Use of lifting equipment (forklift/telehandler)
- Crane Operations
- Limited movement from workshop to go line and tyre bay

Task	Major Hazards	Critical Controls	HIRAC 1 Elimination 2 Substitution 3 Isolate 4 Engineering 5 Administrative 6 PPE	Residual Risk Level	Are the Controls Effective	Actions Required to Improve Effectiveness	How Will We Check They are Working
DRIVING & LOADS ON STEEP GRADES	Mechanical Failure	- Equipment design - Service braking systems -Emergency braking systems -Semi-automatic and automatic transmissions preferable	3, 4	L (C4)	Yes		Electronic break testing and record keeping Road Traffic Safety checkpoint
		- Pre-start inspections	5	L (C4)	Yes	- Review the coverage of brakes and safety critical systems in the pre-start checklists.	Audit
		Planned maintenance	3,4,5	L (C4)	Yes	Review maintenance plans for all mobile equipment, with a focus on brakes and safety critical systems	WKSP MNGR to conduct biweekly inspections on process and actuals Operations
	Missed gear, Incorrect gear or Operator error	Vehicle specific training & assessment - Road rules training & assessment	5	L (C4)	Yes	Audit on competency cards and training matrix	Competency cards. One off check for oncoming crews followed by scheduled and random checks
		- SWPs, road rules,	5	L (C4)	Yes	Review SWP to	Traffic Audits Assess

		traffic controls on roads				include clear requirements and communicate to workforce. (include clarity on road rules, passing rules, procedures, requirements for radios, traffic control)	refresher trg on site road rules Conduct Task observations
LOADING	Equipment interaction	<ul style="list-style-type: none"> - Site Induction - Follow R & Sons Haulage SOP - VOC/Permit Training - Equipment have ROPS - Positive Communication 	5	M (C3)	Yes – Only Competent Operators can operate Loading equipment (Excavator /FEL)	<ul style="list-style-type: none"> - Procedures to be made readily available - Educate operators in the procedures 	Scheduled Reconciliation between Company Training matrix Weekly mechanical inspections Review SOP
	Struck by suspended / carried loads	<ul style="list-style-type: none"> - Follow R & Sons Haulage SOP - Equipment have ROPS 	5	M (C3)	Yes – Only Competent Operators can operate Loading equipment (Excavator /FEL)	<ul style="list-style-type: none"> - Procedures to be made readily available - Educate operators in the procedures 	Scheduled Reconciliation between Company Training matrix Weekly mechanical inspections Review SOP
	Struck by Object / Dropped Load	<ul style="list-style-type: none"> - Follow R & Sons Haulage SOP - Equipment have ROPS 	5	M (C3)	Yes – Only Competent Operators can operate Loading equipment (Excavator /FEL)	<ul style="list-style-type: none"> - Procedures to be made readily available 	Scheduled Reconciliation between Company Training matrix
	Fit for Purpose	<ul style="list-style-type: none"> - Follow R & Sons SOP - Follow Excavator SOP 	5	L (C4)	YES	<ul style="list-style-type: none"> - Procedures to be made readily available 	Scheduled Reconciliation between Company Training matrix

		- Follow FEL SOP					
	Visibility	- Site Induction - Follow R & Sons Haulage SOP - Provide Lighting at Night - Speed Limits	5	M (C3)	Yes – Only Competent Operators can operate Loading equipment (Excavator /FEL)	- Procedures to be made readily available	Scheduled Reconciliation between Company Training matrix
	Pedestrian Movement	- Site Induction - Follow R & Sons Haulage SOP - Positive Communication	5	M (C3)	Yes – Only Competent Operators are allowed to operate Loading equipment (Excavator /FEL)	- Procedures to be made readily available - Positive communications between Spotters and Operators - Pedestrians not permitted in mobile plant area of operations unless controlled by a Spotter	Scheduled Reconciliation between Company Training matrix
	Crushing	- Follow R & Sons Haulage SOP - Equipment have ROPS	5	M (C3)	Yes – Only Competent Operators are allowed to operate Loading equipment (Excavator /FEL)	- Update Procedure - Procedures to be made readily available - Retrain crusher teams in all processes, SWI	Scheduled Reconciliation between Company Training matrix Conduct Task observation towards specific crushing operations
HAULING	Equipment interactions	- Site Induction - VOC /Permit Training - Driving permits - Equipment have	5	M (C3)	Yes	- Confirm positive communications in place before and during hauling operations	Scheduled Reconciliation between Company Training matrix Road Audits Conduct daily and weekly inspections

		<ul style="list-style-type: none"> ROPS - Positive Communication 				<ul style="list-style-type: none"> - Process of communication of TMP changes 	
	Site Road Condition	<ul style="list-style-type: none"> - Equipment have ROPS 	4	M (C3)	Yes	<ul style="list-style-type: none"> - Procedures to be made readily available - Access road maintenance required 	<ul style="list-style-type: none"> - Road Audits
	Pedestrian Movement	<ul style="list-style-type: none"> - Site inductions - Follow Site Haulage SOP - Positive Communication 	5	M (C3)	Yes – Only Competent Operators can operate Hauling equipment Dump Trucks	<ul style="list-style-type: none"> - Procedures to be made readily available 	Scheduled Reconciliation between Company Training matrix Task observation and Site Inspections
	Visibility	<ul style="list-style-type: none"> - Site Induction - Follow Site Haulage SOP - Provide Lighting at night - Speed Limits 	5	M (C3)	Visibility subjectively based.	<ul style="list-style-type: none"> - Procedures to be made readily available 	Audit Procedure by conducting Task observations
	Turning on Ramps	<ul style="list-style-type: none"> - Positive Communication - Spotting at poor visibility areas 	5	M (C3)	Activity not captured in Hauling procedure	<ul style="list-style-type: none"> - Procedures to be made readily available - Refresh all operators/drivers in ramp turning 	Audit Procedure by conducting Task observations
	Fit for Purpose	<ul style="list-style-type: none"> - Follow Site Haulage SOP 	5	M (C3)	Yes	<ul style="list-style-type: none"> - Procedures to be made readily available 	Audit

DUMPING	Dump Condition	- Follow Site Haulage SOP	5	M (C3)	Dum to conditions	- Procedures to be made readily available	Dump Inspection Spotter
	Pedestrian Movement	- Site Induction - Operating Permits - Equipment have ROPS - Positive Communication	5	M (C3)	Yes – Only Competent Operators can operate equipment	- Procedures to be made readily available	Scheduled Reconciliation between Company Training matrix
	Visibility	- Site Induction - Operating Permits - Equipment have ROPS - Positive Communication	5	M (C3)	Visibility subjectively based.	- Procedures to be made readily available	Audit Procedure by conducting Task observations
	Trucks going over Tip head	- Site Induction - Operating Permits - Equipment have ROPS - Positive Communication	5	M (C3)	Yes – Only Competent Operators can operate equipment Spotters in place	- Procedures to be made readily available	Scheduled Reconciliation between Company Training matrix
RECOVERY & TOWING Risk assessment to be conducted for JSEA	Struck by object	- Follow Site Recovery Operations SOP - Chains are NOT used for towing / equipment recovery - Equipment have ROPS	5	M (C3)	Yes – Only Competent Operators can operate equipment	- Review Procedure - Procedures to be made readily available - Towing / Recovery Assessment refresher - Availability of Tow	Confirm Operator Competency Records

						Slings	
	Struck by equipment	<ul style="list-style-type: none"> - Follow Site Recovery Operations SOP - Chains are NOT used for towing / equipment recovery - Equipment have ROPS 	5	M (C3)	Yes – Only Competent Operators can operate equipment	<ul style="list-style-type: none"> - Review Procedure - Procedures to be made readily available - Towing / Recovery Assessment refresher - Availability of Tow Slings 	Confirm Operator Competency Records
RECOVERY & TOWING	Loss control of Equipment	<ul style="list-style-type: none"> - Follow Site Recovery Operations SOP - Chains are NOT used for towing / equipment recovery - Equipment have ROPS 	5	M (C3)	Yes – Only Competent Operators can operate equipment	<ul style="list-style-type: none"> - Update Procedure - to be made readily available - Towing / Recovery Assessment refresher - Availability of Tow Slings 	
DRIVING IN ACTIVE PROJECT SITE	Unsafe Tolerance Culture	<ul style="list-style-type: none"> - Conduct Education for Driver not to drive unsafe LV's - Training - Leadership decision on Defective LV 	5	M (C3)	Yes	Improve workforce knowledge of personal positive behaviour and attitude	Company Training Records Conduct Task observations
	Rock falls	<ul style="list-style-type: none"> - Follow Site High-wall Procedures as per Site induction 	5	M (C3)	Yes	<ul style="list-style-type: none"> - Conduct Training/awareness on the High-wall Procedure through Site inductions 	Company Training Records
	Mechanical failures	<ul style="list-style-type: none"> - Conduct Prestart - Follow tag-out 	5	M (C3)	Yes	Train all workforce in lock out tag out	Pre-start Audits Conduct Task observations

DRIVING IN ACTIVE PROJECT SITE <u>Risk assessment to be conducted for JSEA</u>		<ul style="list-style-type: none"> Procedure - Windows - Emergency Shutdown/STOP - Routine Maintenance - Defensive Training 				procedure	
	Inexperienced Driver	- Training and assessment	5	M (C3)	Yes	Implement mentoring system for new drivers	Company Training Records Conduct of ongoing monitoring (in Cab)
	Runaway failure	<ul style="list-style-type: none"> - Maintain 50m separation distance - Awareness - Positive Communication 	5	M (C3)	Yes	Traffic Management and Operations Inspections Ongoing focus points week by week	Audit of SWP through Task observations
	Unsafe Tolerance Culture	<ul style="list-style-type: none"> - Conduct Education for Driver not to drive unsafe LV's - Training - Leadership decision on Defective LV 	5	M (C3)	Yes	Conduct training to assist the workforce to improve their work place choices	Company Training Records
PIONEERING	Topography / Terrain	Clear access to site • Pioneering sequence designs • Selected operators utilised for task	4	M (C3)	Yes	<ul style="list-style-type: none"> - Audits - Daily Inspections 	- Audit of SWP through Task observations
	Ground Stability	- Geotechnical Inspection and monitoring	5	M (C3)	Yes	Procedure	- Audit of SWP through Task observations

	Fit for Purpose Equipment	- Supervision - Selected operators utilised for task - Pioneering sequence designs	4,5	M (C3)	Yes	JSEA Developed into SWP	- Audit of SWP through Task observations
	Weather	- Cease operations during wet weather	1	M (C3)	Yes	JSEA Developed into SWP	Audit of SWP through Task observations Equipment
	Equipment / Personnel Interaction	- Maintain safe distance - Positive communication	5	M (C3)	Yes	JSEA Developed into SWP	Audit of SWP through Task observations Equipment
SUPERVISION OF WORKFORCE	Workforce is not being Supervised to ensure compliance to Safety requirements.	Competent Supervisors in place and spending time carrying out routine audits on employees (Task observations / JSEAs).	5	M (C3)	Yes	Ongoing audits to be monitored and number to be reviewed	- Daily Prestart - Weekly workshop supervisor meeting
		Superintendents spending time carrying out routine audits on employees (Task observations / JSEAs)	5	M (C3)	Yes	Ongoing audits to be monitored and number to be reviewed	- Weekly Safety inspections - Weekly Workshop meeting - Task observations
CRANE OPERATIONS	Non-Competent Operators using equipment (Operational Incident)	- Reliance Company Matrix - Competency cards	5	M (C3)	Yes		Task observations and any noncompliance. Competency card inspections Training matrix reviewed by W/Shop superintendent
	Equipment Failure	- Conduct Crane prestart prior to operating	5	M (C3)	Yes		

		<ul style="list-style-type: none"> - Inspect chains and slings for current Quarter tag colour - Inspect chain and sling condition prior to use 					
	Dropped Load	<ul style="list-style-type: none"> - Competent/qualified personnel – operator & dogman - Review SWP's before undertaking task and sign off. - Complete personal risk assessment / lift plan/JSEA before lifts - Review O.E.M manuals to check weight of load prior to lifting. - No heavy lifts unless fully competent/qualified supervisor in attendance 	5	M (C3)	Yes		
	Fatigued/ Stressed	<ul style="list-style-type: none"> - Rested and fit for work - Supervision Communication - Alcohol Breath Testing program – random 	5	M (C3)	Yes		

		<ul style="list-style-type: none"> - Employee Assistance Program - Employee fatigue calculator tool to be completed 					
TYRE CHANGING	Non-Competent Tyre Fitters	<ul style="list-style-type: none"> - Training Matrix - Competency cards - Competent tyre fitter 	5	M (C3)	Yes		Task observation and any non-compliance. Competency cards
	Incorrect assembly possible tyre explosion	<ul style="list-style-type: none"> - Competent tyre fitters only to assemble and fit tyres - Review task carry out personal risk assessment before undertaking task and sign off JSEA - Use tyre cage for all tyres 	5	M (C3)	Yes		Task observation Audits
Limited movement (W/Shop to go line / tyre bay)	Non-Passed out Fitters moving equipment in and out of workshops and to tyre bay.	<ul style="list-style-type: none"> - Training package rolled out to test and pass out fitters for limited movement - Test and move - Traffic management within the workshop 	5	M (C3)	Yes	Fitters / operators to carry out personal risk assessment prior to any movement of vehicle within the workshop area	Task observations and any Noncompliance.
	Non-Competent Tyre Fitters (Operational)	<ul style="list-style-type: none"> - Reliance on Company Training 	5	M (C3)	Yes	Need people to have their competencies	Task observations and any Non-compliance.

	Incident)	record to check records				on then and easily checked by Supervisor or other people.	
Service Truck Operation	Fall from Vehicle	<ul style="list-style-type: none"> - 3 Points of contact always - Inspect Steps and stairways on equipment before climbing for damage and mud - Inspect hand rails and kick boards before moving around on machines - At night park up equipment in lit areas - Use access lighting on equipment if available 	5	M (C3)	Yes		
Service Truck Operation	Uncontrolled Vehicle Movement Unplanned, unexpected or uncontrolled movement	<ul style="list-style-type: none"> - Parking Standard is integral in the Site - Permit training and now specifically states - 2 forms of braking are required - Operator Training - Isolation Procedures Brake 	4,5	M (C3)	Yes		

		tests conducted on equipment prior to use - Emergency Procedures					
Use of lifting equipment (forklift/telehandler)	Non-Competent Operators using equipment (Operational Incident)	- Training Matrix - Competency cards - Competent operators	5	M (C3)	Yes		Audits Inspections
	Equipment Failure	- Conduct vehicle prestart prior to operating - Inspect lifting implement attachments - Inspect chain and sling condition prior to use - Inspect chain and slings for current quarter colour tag before use	5	M (C3)	Yes		Audits Competency cards
	Dropped Load	- Competent/qualified personnel – operator & dogman - Review SWP's before undertaking task and sign off - Complete Lift plan /JSEA before lifts					

		<ul style="list-style-type: none"> - Review O.E.M manuals to check weight of load prior to lifting - No heavy lifts unless fully competent/qualified 					
Powered Hand Tools	<ul style="list-style-type: none"> • Amputation • Debris • Dust 	<ul style="list-style-type: none"> • Delineated work area • Equipment Audit • PPE 	5,6	M (C3)	Yes		
Working at Heights	<ul style="list-style-type: none"> • Faulty equipment resulting in fall from heights • Dropped objects • Suspension trauma • Incompetent / Uncertified personnel • Lightning (on high towers) 	<ul style="list-style-type: none"> • Regular equipment checks (weekly and prior to commencing task) • Barricade work area • Training, Assessment & Certification • Job Safety & Environment Analysis (JSEA), Safe Operating Procedure (SOP) • Specialist PPE & equipment 	5,6	M (C3)	Yes		

PROJECT RISK ASSESSMENT

FIRST AID FACILITIES

- Each site should conduct a first-aid needs analysis to identify the first aid requirements for each site.

WORKPLACE FIRST AID ASSESSMENT

Workplace First Aid assessments shall be undertaken for each area to determine:

- Appropriate first aid facilities & stations (points) required;
- Number and qualifications of First Aid Officers required;
- Specific workplace hazards for the area are identified and risk categories assigned;
- This assessment shall include;
- Size and layout of the workplace.
 - Location of the workplace;
 - Number and the distribution of the employees;
 - Arrangements in place for field trips and shift workers;
 - Known occurrence of accidents/ incidents in the industry;
 - The assessment process shall involve Line Managers, First Aid Officers.

RESPONSIBILITIES

Department Head's Responsibilities Each Department Head is responsible to ensure:

- A first aid assessment of the area is undertaken;
- First Aid Officers are appointed and trained;
- First aid facilities and kits are available and maintained;
- Implementation of the First Aid procedure;
- Site induction includes information on First Aid services;
- A review of the first aid assessment is carried out whenever there is significant change to the size or content of the workplace, or an alteration in the type of work being carried out;
- First Aid procedure is audited and reviewed annually.

Line Manager's Responsibilities

- The Line Manager shall appoint a person who shall be responsible for the first aid kit/s in their work area.

The appointed person shall:

- Carry out regular checks to ensure First Aid kits are at designated location/s and audit the contents of the first aid kit/s;
- Restock the first aid kit/s checking expiry dates and replacing expired items;
- Maintain area first aid facilities including equipment;
- Display in a central area a list of First Aid Officers names, location and contact numbers.

First Aid Officers Responsibilities

First aid officers shall:

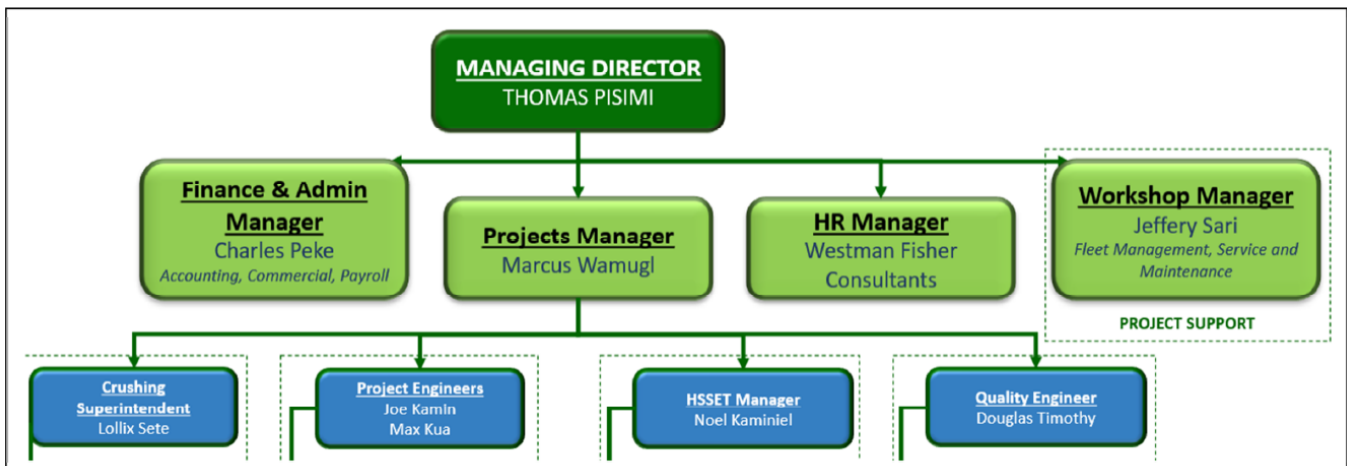
- Assist in the provision of a first aid service within their competencies;
- Assist in the provision of emergency first aid service within their competencies;
- Arrange prompt and appropriate referral for patients who require further treatment;
- Record all treatment given in the First Aid kit register;
- Familiar with specific workplace hazards and conditions;
- Report deficiencies in the first aid service to their Line Manager;
- Able to be called away from their ordinary duties at short notice.

First Aid Kits

First aid kits shall be in readily accessible and prominent locations throughout the workplace. The first aid container shall:

- Be made of an impervious material and protect the contents from dust, moisture and contamination;
- Never be locked;
- Clearly marked with the words "First Aid" and a white cross painted on a green background;
- Contain a list of the minimum contents, emergency telephone numbers and the extension number of the nearest first aid personnel in or located next to the First Aid kit;
- Instructions for emergency treatment of injuries, expired air resuscitation EAR and cardiopulmonary resuscitation (CPR) always kept clean and securely closed (not locked).

The Organizational Structure below shows our management representatives who implement and communicate our Environment Management Plan (EMP).



ENVIRONMENT, HEALTH & SAFETY PERFORMANCE AND CALCULATION

Below is our Safety Performance Statistics for the last four years.

Calendar Year	Number of employees and contractors	Number of Incidents																Total Manhours Worked in Period	Frequency Rates (per million Manhours worked)	
		Fatalities				Lost Time Injuries				Medical Treatment Injuries				Minor Injuries					LTIFR	TRIFR
		Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4			
2018 (current)	167									1								187875	5.32	1.06
2017	183												1					503982	1.98	0.39
2016	175														1			481950	2.07	0.41
2015	166																1	457164	2.18	0.43

For the last 4 years we have had only;

1. 2 x Medical treatment injuries, one occurred in April, 2017 and the other in February, 2018. Investigations were carried out and corrective measures and recommended actions have been implemented and completed;
2. 2 x First Aid injuries in, one in February, 2016 and the other in April, 2015. Both were treated by our site First aider, also minor investigations were carried out and corrective actions have been implemented and completed.



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ENVIRONMENTAL POLICY

We are committed to sustainable development and acting responsibly to protect the environment throughout our diverse operations - which cover a wide range of industry sectors. Continual improvement in environmental performance will be achieved by setting objectives, measuring progress and analysing our performance.

To ensure that we meet our objectives for sustainable development and environmental responsibility we will;

- Plan and resource our activities to minimise our impact to the environment across those activities that we can effectively influence;
- Communicate, promote and encourage Environmental awareness and training to all relevant stakeholders including employees and others working on our behalf;
- Comply with all applicable environmental laws, regulations, statutory obligations and relevant voluntary Codes of Practice;
- Maintain environmental management systems that meet the requirements of the current legislation and are integrated into our business activities;
- Make business decisions that work towards achieving sustainable development;
- Ensure that our employees, contractors and consultants have the necessary skills to fulfil their environmental obligations with respect to our operation;
- Strive to conserve resources, reduce waste and eliminate or minimise adverse environment effects and risk that may be associated with our services and operations;
- Work with our clients and other stakeholders to help them achieve their environmental objectives and obligations; and
- Periodically review and revise our Environmental Policy and procedures to maintain their relevance.

We will respond to the environmental challenges in all areas of our business and it is the responsibility of every employee to work towards compliance with, and the implementation of, our Policy commitments.

THOMAS PISIMI - Managing Director

August 2018

R & SONS CONSTRUCTION LTD